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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,
 JULIAN SANTIAGO, and SUSAN LYNN
 HARVEY, individually and on behalf of all other
 similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-4688-RS

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Richard Seeborg

Date: July 30, 2025

Time: 9:30 a.m.

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC's material should be sealed. The material is included within Plaintiffs' Oppositions to Google's Motions *in Limine*.

Document or Portion of Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing
Plaintiffs' Opposition to Google's Motion <i>in Limine</i> No. 4	Google	Portions highlighted in yellow	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Plaintiffs' Opposition to Google's Motion <i>in Limine</i> No. 5	Google	Portions highlighted in yellow	Refers to Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 3 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 5 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 6 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 7 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit 8 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

1	Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12			Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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3	Exhibit 9 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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6	Exhibit 10 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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9	Exhibit 11 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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12	Exhibit 12 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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15	Exhibit 13 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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18	Exhibit 14 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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21	Exhibit 15 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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1	Exhibit 16 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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4	Exhibit 17 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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8	Exhibit 18 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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11	Exhibit 19 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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15	Exhibit 20 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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18	Exhibit 21 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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22	Exhibit 22 to Omnibus Declaration of Mark C. Mao in Support of Plaintiffs' Oppositions to Google's Motions <i>in Limine</i> Nos. 1–12	Google	Entirety	Material Designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
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Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

1 Dated: July 10, 2025

Respectfully submitted,

2 By: /s/ Mark Mao

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